

August 15, 2005

Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Reference: National Organic Program, Sunset Review, Docket number TM-04-07

Dear Mr. Neal,

In response to your request for comments for the National Organic Program Sunset Review, please accept Barry Callebaut's request that the following substance continue to be allowed for use in organic handling and remain intact on the National List as originally approved.

- **Substance:** Calcium Hydroxide
- **Location on the National List:** Section 205.605(b)

We request this continuation for the following reasons:

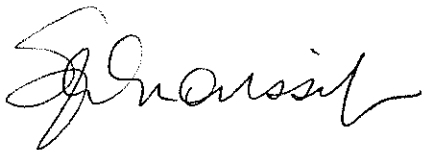
1. Calcium Hydroxide has been determined by the National Organic Standards Board (NOSB) to be consistent with the Organic Foods Production Act (OFPA), its implementing regulations and criteria for substances allowed in organic production and handling.
2. Calcium Hydroxide is necessary in the purification of the freshly squeezed cane juice that is concentrated and crystallized to produce the organic sugar that is common in our diet and essential to the formulation, flavor and consistency of the products Barry Callebaut produces and sells.
3. Barry Callebaut manufactures organic chocolate and we are able to make those products because Calcium Hydroxide is allowed for organic sugar processing and that our business's success depends

on large part on the consistent and continuous availability of organic sugar.

4. Barry Callebaut uses organic sugar in a quantity that qualifies our product(s) for its 95% and above "Organic" status, allowing us to use the **USDA ORGANIC** seal on our labels, which our customers look for and trust.
5. Barry Callebaut understands that there are no viable alternatives to Calcium Hydroxide in the production of organic sugar.
6. Barry Callebaut understands that Calcium Hydroxide is produced today by the same methods used when it was first placed on the National List in 1995.
7. Barry Callebaut is aware of no reason why Calcium Hydroxide should not be allowed for use in organic handling and we confidently support its continued approval.

Thank you very much and please contact us for any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Morisset', with a stylized, cursive script.

Sylvie Morisset
Technical & Regulatory Affairs Manager
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